

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MATTHEW RIGNEY et al.,)	
)	NO. 3:22-CV-00342
Plaintiffs,)	(consolidated)
v.)	
)	JUDGE WAVERLY D. CRENSHAW,
CSX TRANSPORTATION, INC.,)	JR.
)	
Defendant.)	MAGISTRATE JUDGE ALISTAIR
)	NEWBERN
)	

JOINT STATUS REPORT

COME NOW the parties to this action, by and through their respective counsel of record and in compliance with the Order entered by the Court on April 27, 2023 (Doc. No. 80), submit the following Joint Status Report:

The parties have exchanged and answered written discovery. The parties engaged in correspondence and on June 9, 2023 held a meet and confer to discuss deficiencies in Defendant CSX's discovery answers. Plaintiffs anticipate filing a motion to compel within the next seven (7) days. Defendant is compiling correspondence to Plaintiff's counsel regarding deficiencies in the responses to discovery by individual Plaintiffs and will attempt to informally work through those deficiencies prior to assessing the need for a motion to compel. Additionally, counsel have agreed to begin taking depositions in approximately September 2023. There have been no additional settlement discussions since private, in-person mediation was held on April 11, 2023.

Respectfully submitted this 26th day of June, 2023, by:

/s/ S. Camille Reifers
S. Camille Reifers (BPR #19856)
John J. Bennett (BPR #31976)

REIFERS, HOLMES & PETERS LLC
80 Monroe Avenue, Suite 410
Memphis, TN 38103
(901) 521-2860
creifers@rhpfirm.com
jbennett@rhpfirm.com

Attorneys for CSX Transportation, Inc.

/s/ Peter J. Flowers
Timothy V. Potter
Andrew E. Mills
Reynolds, Potter, Ragan & Vandivort, PLC
210 East College Street
Dickson, Tennessee 37055
615.446.2221
615.446.2232 Facsimile
tpotter@rprvlaw.com
amills@rprvlaw.com

Peter J. Flowers
Frank V. Cesarone
Meyers & Flowers, LLC
3 North Second Street – Suite 300
St. Charles, Illinois 60174
630.232.6333
630.845.8982 Facsimile
pjf@meyers-flowers.com
fvc@meyers-flowers.com

C. Richard Newsome
Newsome Melton, PA
201 South orange Avenue – Suite 1500
Orlando, Florida 32801
407.648.5977
407.648.5282 Facsimile
newsome@newsomlaw.com
ourand@newsomelaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on June 26, 2023, the forgoing document has been served via the Court's CM/ECF system to the following Counsel of Record:

Timothy V. Potter
Andrew E. Mills
Reynolds, Potter, Ragan & Vandivort, PLC
210 East College Street
Dickson, Tennessee 37055
615.446.2221
615.446.2232 Facsimile
tpotter@rprvlaw.com
amills@rprvlaw.com

Peter J. Flowers
Frank V. Cesarone
Meyers & Flowers, LLC
3 North Second Street – Suite 300
St. Charles, Illinois 60174
630.232.6333
630.845.8982 Facsimile
pjf@meyers-flowers.com
fvc@meyers-flowers.com

C. Richard Newsome
Newsome Melton, PA
201 South orange Avenue – Suite 1500
Orlando, Florida 32801
407.648.5977
407.648.5282 Facsimile
newsome@newsomlaw.com
ourand@newsomelaw.com

Attorneys for Plaintiff

/s/ S. Camille Reifers
S. Camille Reifers